

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

APPLICATION OF LOUDMILA
BOURLAKOVA AND VERONICA
BOURLAKOVA TO TAKE DISCOVERY FOR
USE IN A FOREIGN PROCEEDING
PURSUANT TO 28 U.S.C. § 1782

Case No. 24 Misc. _____

**APPLICATION AND PETITION OF LOUDMILA BOURLAKOV
AND VERONICA BOURLAKOV FOR AN ORDER TO TAKE DISCOVERY FOR USE
IN A FOREIGN PROCEEDING PURSUANT TO 28 U.S.C. § 1782**

Petitioners Loudmila Bourlakova and Veronica Bourlakova (“Petitioners”), pursuant to 28 U.S.C. § 1782 respectfully apply to this Court for an Order authorizing Petitioners to obtain certain limited discovery from Clearing House Payments Company L.L.C. (“CHIPS”) for use in a civil proceeding pending before the High Court of Justice, Business and Property Courts of England. In support of this Application, Petitioners submit a Memorandum of Law and attach the Declarations of Naomi Simpson (the “Simpson Declaration”), and the Declaration of Daniel J. Pohlman (the “Pohlman Declaration”) each with accompanying exhibits. The proposed subpoena *duces tecum* to be served on CHIPS is attached as Exhibit 1 to the Pohlman Declaration, and a proposed Order is attached as Exhibit 2 to the Pohlman Declaration.

Dated: New York, New York
February 20, 2024

PRYOR CASHMAN LLP

By: /s/ E. Scott Schirick
E. Scott Schirick
Sidhardha Kamaraju
Daniel J. Pohlman

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